

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

CALIFORNIA COALITION FOR WOMEN
PRISONERS; R.B.; A.H.R.; S.L.; J.L.; J.M.;
G.M.; A.S.; and L.T., individuals on behalf of
themselves and all others similarly situated,

Plaintiffs

v.

UNITED STATES OF AMERICA FEDERAL
BUREAU OF PRISONS, a governmental entity;
BUREAU OF PRISONS DIRECTOR
COLETTE PETERS, in her official capacity;
FCI DUBLIN WARDEN THAHESHA JUSINO,
in her official capacity; OFFICER
BELLHOUSE, in his individual capacity;
OFFICER GACAD, in his individual capacity;
OFFICER JONES, in his individual capacity;
LIEUTENANT JONES, in her individual
capacity; OFFICER LEWIS, in his individual
capacity; OFFICER NUNLEY, in his individual
capacity; OFFICER POOL, in his individual
capacity; LIEUTENANT PUTNAM, in his
individual capacity; OFFICER SERRANO, in
his individual capacity; OFFICER SHIRLEY, in
his individual capacity; OFFICER SMITH, in his
individual capacity; and OFFICER VASQUEZ,
in her individual capacity,

Defendants.

CASE NO. 4:23-CV-04155-YGR

**DECLARATION OF WILLIAM W.
LOTHROP, DEPUTY DIRECTOR,
FEDERAL BUREAU OF PRISONS**

I, WILLIAM W. LOTHROP, declare as follows:

1. My name is William W. Lothrop, and I am the Deputy Director of the Bureau of Prisons.
2. I am familiar with the contents of the document relating to an ex parte contact with the court that government seeks to file under seal.
3. The content of this notice contains highly sensitive information. It relates to the management of FCI Dublin, including details about operational decisions and future planning at the facility.
4. Disclosure of such information to the public, to inmates, and even to opposing counsel would be detrimental to facility management and would increase risk to BOP staff and inmates alike.

1 I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and
2 correct. Executed this 25th day of March 2024.

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A handwritten signature in black ink, appearing to read 'W. Lothrop', with a long horizontal line extending to the right.

William W. Lothrop
Deputy Director
Bureau of Prisons